

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMON R. SIMMONS,

Defendant.

Criminal Action No. **07-69-GMS.**

**PETITION FOR WRIT OF  
HABEAS CORPUS AD PROSEQUENDUM**

Your Petitioner, the United States of America, by its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Shawn E. Martyniak, Special Assistant United States Attorney for the District of Delaware, respectfully states:

1. On May 02, 2007, the defendant was indicted for possession of a firearm by a person prohibited, in violation of 18 U.S.C. § 922(g).
2. The defendant is currently a pretrial detainee on various State offenses. The defendant is detained at the Howard R. Young Correctional Institution, Wilmington, Delaware.
3. The defendant has not had an initial appearance in the District Court for the District of Delaware. A weekly schedule of Initial Appearances and Arraignments is scheduled for Thursday, June 28, 2007, at 1:00 p.m.

**WHEREFORE,** Petitioner prays that the Clerk of this Court be instructed to issue a Writ of Habeas Corpus Ad Prosequendum to the United States Marshal, District of Delaware, and to the Warden for the Howard R. Young Correctional Institution, to bring the said defendant before this Court on June 28, 2007, at 1:00 p.m. for an Initial Appearance and to be held in the custody of the U.S. Marshal until such time as these proceeding are complete.




Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

By: /s/ Shawn E. Martyniak  
Shawn E. Martyniak  
Special Assistant United States Attorney

Dated: June 13, 2007

IT IS SO ORDERED this 18<sup>th</sup> day of JUNE, 2007.

  
HONORABLE MARY PAT THYNGLE  
United States Magistrate Judge